

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

STATUTORY REVIEW OF THE SYSTEM FOR  
REGULATING RATES AND CLASSES FOR  
MARKET-DOMINANT PRODUCTS

Docket No. RM2017-3

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR FILING OF  
APPENDICES TO REPORTS FILED WITH ORDER NO. 5337**  
(February 6, 2020)

On December 5, 2019, the Commission issued Order No. 5337 in this proceeding. With it, the Commission posted two reports by Northwest Postal Consulting dated March 27, 2017, regarding (1) the Postal Service's total factor productivity (TFP) model and (2) productivity measurement before and after the Postal Accountability and Enhancement Act of 2006. The final page of each report lists six appendices:

Appendix 1: Consolidated TFP Data Set – 2016 Final

Appendix 2: Single Year Example

Appendix 3: TFP Methodology – Reference Documents

Appendix 4: Alternative Methodology for the Workload Weighting Factor

Appendix 5: NWPC TFP Model – Version 2 (Excel File)

Appendix 6: Graphs Used in Reports 1 & 2 (Excel File)

However, these appendices are not incorporated in the PDF files of the reports, nor were they filed separately with Order No. 5337 or thereafter.

Certain of the initial comments and accompanying declarations in this proceeding make technical arguments about the TFP methodology. In order to evaluate and respond to those arguments, it is essential for the Postal Service and other interested parties to have access to the full range of available materials underlying the TFP reports

on which the Commission has relied.

Reply comments are due on March 4. The relief sought by this motion is extremely unlikely to draw opposition, given its substance and the lack of apparent prejudice to any party.<sup>1</sup> Under these circumstances, it would be appropriate for the Commission to waive Rule 3001.21(b) and grant summary relief by posting the appendices in question. At the very least, if the Commission is determined to provide a period for answers to this motion, it would be appropriate to fix an “other period” significantly shorter than the standard seven days, as permitted by Rule 3001.21(b).

Respectfully submitted,  
UNITED STATES POSTAL SERVICE

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<sup>1</sup> It is not apparent that the appendices contain non-public information. Even if so, that would merely be a basis to post them as non-public library references with redacted public versions, not to withhold them entirely.